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January 8, 2020

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**Via Electronic Case Filing**

The Hon. Valerie E. Caproni  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

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**Re: Creque, Alexander v. John Beatty Jr.**  
**Docket No.: 1:19-cv-09492-VEC**  
**Our File No.: SF.10786**

**MEMO ENDORSED**

Dear Honorable Judge Caproni,

My office represents Defendant, John Beatty Jr., in the above-referenced matter. Please be advised that there is an initial conference currently scheduled in this case for Friday, January 10, 2020. After discussing this matter with Plaintiff's counsel, Ryan Goldstein, we are jointly requesting that the conference be adjourned. We are requesting an adjournment at this time due to the pending Motion to Dismiss that was filed by Defendant on January 2, 2020. Although a joint letter and proposed case management plan was to be submitted by January 2, 2020, due to the pending motion the parties do not wish to enter into a discovery schedule until a decision on the motion is made. Therefore, we are respectfully requesting an adjournment of the initial conference until after the pending motion is either fully submitted or decided by this Court.

All of the above has been discussed between counsel and this letter is being submitted jointly between all parties.

Thank you for your time and attention to this matter.

Very truly yours,  
*Samantha Pullman*  
 SAMANTHA PULLMAN, ESQ.

cc: Law Office of Ryan S. Goldstein, PLLC (via ECF)

The initial conference is adjourned pending further order. Although it appears that the parties have had some discussion about the pending motion, the parties are advised to carefully consider whether a transfer to the Eastern District of Pennsylvania, via mutual consent, makes more sense than the expenditure of further resources on Defendant's motion. To the extent that the parties reach an agreement, they must promptly inform the Court to conserve judicial resources.

SO ORDERED.

Date: 01/08/2020

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the printed name.

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE